

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
GAINESVILLE DIVISION

Santana Bryson and Joshua Bryson, as Administrators of the Estate of C.Z.B., and as surviving parents of C.Z.B., a deceased minor,	*
	*
	*
	*
Plaintiffs,	*
	*
	Civil Action File
v.	*
	*
	No. 2:22-cv-17-RWS
Rough Country, LLC	*
	*
Defendant.	*

**PLAINTIFFS' SECOND AMENDED NOTICE OF VIDEOTAPED  
DEPOSITION OF KEN DUNN FOR USE AT TRIAL**

**TO: Ken Dunn  
CEO, Rough Country, LLC  
c/o Richard H Hill, II, Esq.  
Lindsay G. Ferguson, Esq.  
Claire C. Murray, Esq.  
Aaron B. Chausmer, Esq.  
Weinberg, Wheeler, Hudgins, Gunn & Dial, LLC  
3344 Peachtree Road, NE, Suite 2400  
Atlanta, GA 30326**

COMES NOW the Plaintiffs in the above-captioned matter and hereby notice the trial videotaped deposition of Ken Dunn. The deposition will begin Wednesday, April 2, 2025, at 10:00 a.m. (CDT) at Veritext Court Reporting located at 236 Adams Avenue, Memphis, TN 38103. The deposition will be by oral examination, on cross-examination, before an officer duly authorized to

administer oaths for all purposes permitted by the Federal Rules of Civil Procedure including use at trial. The deposition will be recorded by stenographic and audiovisual means.

Respectfully submitted this 28<sup>th</sup> day of March, 2025.

CANNELLA SNYDER LLC

*/s/ Tedra L. Cannella*

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***ATTORNEYS FOR PLAINTIFFS***

**CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rules 5.1(B) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font and size requirements and is formatted in 14-point Times New Roman font.

CANNELLA SNYDER LLC

/s/ *Tedra L. Cannella*

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *PLAINTIFFS' SECOND AMENDED NOTICE OF VIDEOTAPED DEPOSITION OF KEN DUNN FOR USE AT TRIAL* was electronically filed with the Clerk of Court via CM/ECF, which will automatically serve the following attorneys of record:

Richard H. Hill  
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Lindsay G. Ferguson  
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This 28<sup>th</sup> day of March, 2025.

CANNELLA SNYDER LLC

/s/ *Tedra L. Cannella*  
Tedra L. Cannella  
Georgia Bar No. 881085  
*Attorney for Plaintiffs*